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April 14, 2020

VIA ECF

Magistrate Judge Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: Norris/Premiere Ford Lincoln et al, Civil Case No.:19-cv-06204-MKB-LB: Plaintiffs'
First Request for an Extension of time to File an Amended Complaint

Dear Magistrate Judge Bloom:

I represent Joseph Norris, Plaintiff in the above captioned matter, and write in support of Plaintiffs' request for an extension of time to file an amended complaint due to circumstances presented by the ongoing and unprecedented Covid-19 pandemic.

First, Plaintiff reports that he was unable to compile the necessary records needed to amend his complaint due to the Covid-19 pandemic and the recent loss of a relative from Covid-19, that has had his undivided attention for the past several weeks. Plaintiff remains optimistic that he will file an amended complaint within the next 30-days, or by May 15, 2020, however would like the case to move forward into discovery due to the uncertainty of when he will have complete access to the records needed to craft an amended complaint. Thus, in light of the extraordinary and unprecedented circumstances presented by the pandemic, Plaintiff wishes to move forward with his original complaint and will endeavor to file an amended complaint hopefully within the next 30-days by May 15, 2020 or later in time pursuant to Rule 15, et. seq. of the Federal Rules of Civil Procedure once circumstances permit.

This is Plaintiffs' first request for an extension of time to file an amended complaint.

Opposing counsel has graciously consented to Plaintiffs' request to file an amended complaint within 30-days, however has requested that to the extent Plaintiffs' request is granted Defendants' time to respond to the proposed amended complaint be extended in kind.

Accordingly, it is respectfully requested that discovery proceed based on the original pleading and that Plaintiffs' time to file an amended complaint be extended until May 15, 2020, or such time that circumstances permit in which case Defendants' time to respond to the proposed pleading will be extended in kind.

Respectfully Submitted,



A handwritten signature in black ink, appearing to read "C. D. Henry".

/s/

Chauncey D. Henry, Esq.

CDH: cdh.

cc: All parties (*Via ECF*)